

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AIR CARGO SHIPPING
SERVICES ANTITRUST LITIGATION

Master File 06-MD-1775 (JG) (VVP)

MDL No. 1775

**STIPULATION AND [PROPOSED] ORDER TO EXTEND THE DEADLINE FOR
PLAINTIFFS TO TAKE THE RULE 30(B)(6) DEPOSITION OF
CATHAY PACIFIC AIRWAYS**

WHEREAS the parties' Fifth Stipulated Revised Discovery and Class Certification Briefing Schedule (as ordered by the Court on March 6, 2013) set a deadline of December 31, 2013 by which fact discovery would end;

WHEREAS Plaintiffs served a Rule 30(b)(6) deposition notice on Cathay Pacific Airways ("Cathay Pacific") on November 27, 2013 to establish the foundation for admissibility of documents attached to the notice (the "Specified Documents");

WHEREAS the aforementioned Rule 30(b)(6) deposition is scheduled for December 30, 2013;

WHEREAS the Parties agree that the aforementioned Rule 30(b)(6) deposition may be rescheduled and conducted after December 31, 2013, as set forth below;

WHEREAS counsel for Cathay Pacific agrees to identify by January 31, 2014, any objections to the foundation for admissibility of the Specified Documents;

WHEREAS counsel for Plaintiffs and counsel for Cathay Pacific agree that the Parties will meet and confer and negotiate in good faith to resolve any disputes regarding the foundation for admissibility of the Specified Documents and will endeavor to reach an agreement without the need for a deposition;

WHEREAS the Parties have agreed that in the event a deposition remains necessary, that

the deposition will occur on or before May 31, 2014;

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among the undersigned, that:

The deadline for Plaintiffs to take the Rule 30(b)(6) deposition of Cathay Pacific (as noticed on November 27, 2013) is extended until May 31, 2014, but that the discovery deadline of December 31, 2013 as between these parties otherwise remains intact.

Dated: December 23, 2013

Respectfully submitted,

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So Ordered

Victor V. Pohorelsky

United States Magistrate Judge

Dated: _____